

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION**

THE STATE OF MISSOURI; THE STATE
OF TEXAS,

Plaintiffs,

v.

JOSEPH R. BIDEN, in his official capacity as
President of the United States, *et al.*

Defendants.

No. 7:21-cv-00420
(formerly No. 6:21-cv-00052)

THE GENERAL LAND OFFICE OF TEXAS,
and DAWN BUCKINGHAM, M.D., in her
official capacity as Commissioner of the Texas
General Land Office,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
HOMELAND SECURITY; and ALEJANDRO
MAYORKAS, in his official capacity as
Secretary of the Department of Homeland
Security,

Defendants.

No. 7:21-cv-00272

**PLAINTIFFS AND DEFENDANTS' JOINT NOTICE OF
DISCOVERY AGREEMENT**

Plaintiffs and Defendants jointly notify the Court that they reached agreement
on the discovery that will be provided by Defendants to Plaintiffs regarding

Defendants’ ongoing activities under and pursuant to the Court’s preliminary injunction (and forthcoming permanent injunction).

During the March 28, 2024 hearing, the Court acknowledged that, “what is subject to the injunction I think, obviously, needs to have at least a review at least at some high level.” Tr. at 31. The Court also encouraged counsel to work out a reasonable discovery expectation.

The parties have consulted in good faith and done that. Defendants will provide bimonthly (every two months) updates to counsel for Plaintiffs beginning July 1, 2024, and continuing through October 1, 2025 (*i.e.*, the end of the obligation period for the FY21 funds). The updates shall include:

- The date of the contract award;
- The amount of the contract award;
- A description of how the work is consistent with the court’s injunction;
- Award ID (PIID, FAN, or URI);
- Identification of the recipient (Name, UEI, or Legacy DUNS); and
- Location (Sector).

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Date: April 30, 2024

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on April 30, 2024, a true and accurate copy of the foregoing document was electronically filed through the Court's CM/ECF System and that a copy of the foregoing will be sent via email to all parties by operation of the Court's electronic filing system, all consistent with Federal Rule of Civil Procedure 5(b).

/s/ Austin R. Nimocks

Austin R. Nimocks